

1 WILLIAM B. TERRY, ESQ.
Nevada Bar No. 001028
2 WILLIAM B. TERRY, CHARTERED
530 South Seventh Street
3 Las Vegas, Nevada 89101
(702) 385-0799
4 (702) 385-9788 (Fax)
Info@WilliamTerryLaw.com
5 Attorney for Defendant

6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,)
9 Plaintiff,) CASE NO. 2:11-cr-355-LDG (RJJ)
10 vs.)
11 HANLON BAGGS,)
12 Defendant.)

13 **MOTION TO TERMINATE PRETRIAL DIVERSION WITH A DISMISSAL**
14 **OF THE CASE**

15 It is certified that the instant motion is timely filed.

16 COMES NOW the Defendant, HANLON BAGGS, by and through his counsel, WILLIAM
17 B. TERRY, ESQ., of the law offices of WILLIAM B. TERRY, CHARTERED and moves that this
18 Honorable Court enter an order terminating the diversion program which both the Government and
19 Mr. Baggs entered into and, further, asks that the case be dismissed consistent with the diversion
20 agreement.

21 This Motion is made and based upon the attached analysis of facts in support hereof, and
22 any oral arguments as may be presented at the hearing in this matter.

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24
25 /s/ William Terry
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28 Attorney for Defendant

ANALYSIS OF FACTS

On a prior occasion the defendant, HANLON BAGGS, was given an opportunity under the Pretrial Diversion program to enter into an agreement with the United States Government which would ultimately allow the dismissal of his case. The agreement called for a diversion period not to exceed 18 months. As of the time of the filing of the instant motion that 18 month period has now expired. Mr. Baggs is still being supervised and based on information and belief has complied with all directives including: to remain trouble free; to do counseling; to do community service; to report when required; etc. Mr. Baggs himself has inquired as to the termination of the diversion program and simply has been told that he is required to report and comply as directed by the program.

On Monday, March 10, 2014, counsel for Mr. Baggs called the United States Attorney's Office to find out who was responsible for the instant case. Undersigned counsel had originally dealt with former Assistant U.S. Attorney, Nancy Koppe, who is now a United States Magistrate. As a result, she is no longer the "contact person" for counsel to deal with. In calling the United States Attorney's office counsel inquired as to who the attorney was that would be responsible for this case. As of the time of the filing of the instant motion, no response has been given to that question. As a result, counsel finds it necessary to file the instant motion to ask the Court to allow that the case be dismissed with a note that Mr. Baggs has successfully complied with all the requirements of Pretrial Diversion for the necessary period of time.

DATED this 12th day of March, 2014.

WILLIAM B. TERRY, CHARTERED

/s/ William Terry
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530 South Seventh Street
Las Vegas, Nevada 89101
(702) 385-0799
Attorney for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I am an employee of William B. Terry, Chartered and that on the 12th day of March, 2014, I served a true and accurate copy of the foregoing **MOTION TO TERMINATE PRETRIAL DIVERSION WITH A DISMISSAL OF THE CASE** by CM/ECF to the United States District Court - District of Nevada, who will notify the following party:

United States Attorney's Office
Attorney for Plaintiff

/s/ Sarah Daniels
An Employee of William B. Terry, Chartered